UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

RECEIVED HON. Brian M. Cogan MAR 2'8 2022

BENJAMIN PAGANO, PAIGE ACEVEDO, and MAGGIE MCNEIL, on behalf of themselves and all others similarly situated,

Case No: 1:22-cv-04897-BMC

Plaintiffs,

v.

HN & SONS LLC d/b/a BUSHWICK PUBLIC HOUSE, DERIHU 18 LLC a/k/a CHISPA, HOOMAN ENAYATIAN, DAVID LARODA, JOSH BECKETT, JOHN DOE and/or JANE DOE #1-10,

Defendants.
 X

DECLARATION OF HOOMAN ENAYATIAN

HOOMAN ENAYATIAN, under penalty of perjury, declares the following to be true and correct:

- 1. My name is Hooman Enayatian, a defendant in the above captioned action.
- 2. I respectfully submit this declaration to support the application of my attorneys, Hang & Associates, PLLC to reconsider the sanctions imposed against me by this Court on March 21, 2023.
- 3. I in no way am trying to waste your honor's or the court's time frivolously. Unfortunately I had a death in the family and being jewish i must not work for 7 days and needed to attend to

the arrangements and family obligations. I read the \$2000. Sanction and I am praying that you

may reconsider as this would be a tremendous hardship for me and my family.

Regarding the posting please be advised that I sent a picture of the best location which is

located on the back of the door to our employee storage/office which is an employee only area

where customers are not permitted in however the employees are there several times during

shifts. I have no preference if the court would like to come to the bar, I can provide a video of the

entire bar to show you proof of how the bar is situated. I in no way am trying to prolong the

process. I would like to aid and assist with as much transparency as humanly possible.

If you must impose the sanctions previously ordered Can you please give me more time to pay

or payment plans.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

Date

HOOMAN ENAYATIAN

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